

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DISTRICT

|                           |   |                         |
|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, | ) |                         |
|                           | ) |                         |
| Plaintiff,                | ) |                         |
|                           | ) |                         |
| v.                        | ) |                         |
|                           | ) | No. 4:19-CR-554 AGF PLC |
| TERICO C. DUDLEY,         | ) |                         |
|                           | ) |                         |
| Defendant.                | ) |                         |

**GOVERNMENT'S RESPONSE TO DEFENDANT'S PRETRIAL MOTIONS**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Dianna R. Collins, Assistant United States Attorney for said District, and makes the following response to defendant's pretrial motions. In support, the government states the following:

**Motion to Dismiss Indictment, DCD 51:**

The Government intends to supersede the original indictment with clarifying language. This clarifying language should render this motion moot.

**Motion to Suppress Statements, DCD 52:**

Dudley has moved to suppress statements he made to Saint Louis County Detectives on December 18, 2017. The United States opposes this motion. Dudley was advised of his rights pursuant to Miranda v. Arizona, 384 U.S. 436 (1966) prior to substantive questioning. He voluntarily waived these rights by agreeing to speak to Detective Slaughter. Each time the interview was interrupted, Detective Slaughter reminded the Defendant of his Miranda rights. At no point did the Defendant invoke his right to counsel or ask to cease the interview. Detective

Slaughter was calm and respectful throughout the interview. The Defendant was jovial and conversational throughout the police contact. Because the Defendant made his statement's pursuant to a valid Miranda waiver, and did not unequivocally invoke his right to remain silent, his statements are admissible.

The United States intends to call Detective Slaughter as a witness at the motions hearing, and introduce a recording of the interviews as evidence.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney  
/s/ Dianna R. Collins  
Dianna R. Collins, 59641MO  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, MO 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

/s/ Dianna R. Collins  
DIANNA R. COLLINS, 59641MO  
Assistant United States Attorney